

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

Allstate Ins. Co., et al.,

Civil Action No. 1:08-cv-4405-SLT-PK

Plaintiffs,

- against-

Declaration of Roman Matatov

Mark Mirvis, et al.,

Defendants.

I, Roman Matatov, declare under penalty of perjury and pursuant to 28 U.S.C. § 1746, that the following is true and correct:

1. I make this declaration in support of the motion to quash the subpoena served by Plaintiff Allstate Insurance Company, Inc. ("Allstate") upon J/P Morgan Chase Bank, N.A. insofar as it seeks records pertaining to my company Queens Billing, Inc., and to correct an earlier misstatement.
2. In my declaration dated May 3, 2016, I misstated the amount of money and checks that Queens had written to Nortmed. Due to a miscommunication, my accountant, Rina Esterov, failed to search for records of payments to Nortmed before 2013.
3. This failure led my accountant to tell me that the amounts stated in Exhibit 2 to the Motion Quash were the total amounts ever paid by Queens to Nortmed.
4. I did not recall, exactly, when Queens had sent files to Nortmed, nor the specific. I thus based the statements in my Declaration upon what my accountant informed me.
5. I therefore failed to include the January 31, 2012 check for \$8,829.00 in my statement as to the amount Queens had paid Nortmed.
6. My accountant has also informed me that she mistakenly overlooked an additional check for \$270.00 Queens made out to Nortmed in 2014.
7. Those payments were made to Nortmed in exchange for Nortmed's work preparing No-Fault files and claims for litigation and arbitration.

8. Furthermore, because I had forgotten about the 2012 payment and related work performed by Nortmed, I also failed to recall that Nortmed did not fully complete the work it had agreed to and thus issued a partial refund of the January 31, 2012 check.
9. That refund amounted to \$3,000, made by check dated April 12, 2012. I do not remember Queens receiving further payments from Nortmed.
10. However, Queens and its accountants do not keep comprehensive records of the source of all checks written to Queens and therefore all my statements about the source of checks are based solely on my memory.
11. Aside from sending files to Nortmed to be physically prepared for litigation and/or arbitration, Queens has had no other business relationship with Nortmed.

I, Roman Matatov, declare under penalty of perjury that the foregoing is true and correct.

Executed on 6/9/2016



Roman Matatov
Owner
Queens Billing, Inc.